

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

STATE OF NEW YORK, et al.,)	
)	
Plaintiffs,)	
v.)	CIVIL ACTION NO. 25-11221-WGY
DONALD J. TRUMP, in his official capacity)		
as President of the United States, et al.,)	
)	
Defendants.)	

DECLARATION OF FRANCIS EANES

EXECUTIVE DIRECTOR OF MAINE LABOR CLIMATE COUNCIL

I, Francis Eanes pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury as follows:

RELEVANT BACKGROUND AND EXPERIENCE

1. I am over the age of 18 and competent to testify to the facts contained in this Declaration.
2. I am the Executive Director of the Maine Labor Climate Council (MLCC), a coalition of 20 labor unions founded in 2022 in the state of Maine working together to create good jobs for all workers as our state transitions to clean energy.
3. Our work includes educating our fellow workers, building alliances, and

advocating for policy solutions that put Mainers to work, so that we do not have to choose between a healthy planet and having a good job that can sustain our families and communities.

4. Members of our coalition directly represent hundreds of workers who have already been employed in the offshore wind industry today, and are depending on the thousands of additional jobs that the industry promises to bring to Maine.

5. Our member organizations have invested many hundreds of thousands of dollars to stand up and run and pay for training programs to train workers on skills specific to the offshore wind industry. For example, Millwrights Local 1121 have trained approximately 150 workers over the past three years with training required specifically for offshore wind projects. All together, the North Atlantic States Regional Council of Carpenters have trained about 300 members with offshore wind specific training.

6. As another example, Iron Workers Local 7 has invested in the purchase of a Mobile Training Center that is able to bring high-torque training – a training necessary to properly and safely fasten the bolts used for the large turbines in offshore wind – to workers across the State of Maine. At least 22 Mainers from Iron Workers Local 7 have gotten training for offshore wind work along with dozens more from Massachusetts in that Local alone.

7. Iron working is a skilled trade. These members work large structural construction projects to erect, place, and join steel girders, columns, and other structural components that form the framework of buildings, bridges, and other structures – like offshore wind turbines. On offshore wind projects iron workers play a crucial role in both construction and maintenance. They install foundations, erect the turbine's towers, install parts like the nacelle and blades that the towers need to generate electricity, and generally perform structural work on the offshore wind turbines throughout construction, repairs and maintenance.

8. Our member organizations have been employed doing iron work and more on projects like the Vineyard Wind project in Massachusetts, on the Revolution Wind project in Rhode Island, and on the Coastal Virginia Offshore Wind project in Virginia. Our members are in the jobs that the offshore wind industry would bring to the region.

9. In addition to these existing projects, our members anticipated many hours of work for jobs constructing twelve turbines that had been announced and funded for a Floating Research Array off the coast of Maine, using technology developed by the University of Maine. We also anticipated many hundreds of hours of work on jobs for offshore wind farms off the coast of Maine as a result of legislation that the state passed to procure energy from offshore wind farms. Moreover, in the short term, we further anticipated jobs with many thousands of hours of work constructing an offshore wind port in Maine. Because of the pause, none of these projects are moving forward right now, and none of these jobs are coming online.

10. In anticipation of working these jobs, our members invested in creating a pipeline of skilled workers who could do the work that was expected. It takes time to train workers, and so we cannot simply wait until jobs already exist to begin training, we have to be able to get ahead of the ball with investments in training. For example, they purchased a Mobile Training Center that could provide training for workers who would be working on offshore wind, as well as additional safety training that is specific to offshore wind (such as Fall Training and Rope Safety Training). The developers of offshore wind facilities required that all workers seeking offshore jobs complete a specified training curriculum. To the best of my knowledge, this curriculum had not been provided to American workers before the onset of offshore wind development in U.S. waters, and if American workers had not received this training, all of the jobs related to offshore wind construction and maintenance in American waters would have been from other countries.

11. Among the skills that were in the curriculum of the Mobile Training Center was the use of high-torque equipment. This is specialized equipment with powerful hydraulic tighteners to fasten the kinds of bolts used on the large wind turbines for offshore wind farms. In short, High-Torque Training teaches workers the proper use of this specialized equipment to minimize the possibility of bolt shearing from an overtightened bolt, or a loosening from an undertightened bolt. When these bolts are supporting equipment worth many millions of dollars, it is absolutely imperative that each and every bolt be properly fastened.

12. Our member's Mobile Training unit also conducted Fall Training for members seeking offshore wind jobs. Fall Training teaches iron workers how to recognize, prevent, and respond to fall hazards in their work environment. This type of training is crucial for our members because when they are working on offshore wind turbines, workers can often be anywhere from 300 to even 850 feet up in the air, and falls are a leading cause of injury and death in the ironworking trade.

13. In addition to the High-Torque Training and Fall Training, our members provide Helicopter Underwater Escape (HUET) Training, and Rope Safety Training for workers. These kinds of trainings are also crucial to working on offshore wind, where transport often occurs via helicopter from shore to turbine, and where work is often taking place while in a rope and harness.

14. HUET training provides workers with in-depth instruction on how to prepare workers for emergency situations involving helicopter travel. It focuses on teaching techniques necessary to survive and escape from a helicopter in the event of an emergency, as well as proper procedures that should be followed to remain safe and act quickly under pressure. This training requires a practical simulation of a helicopter ditching in a controlled environment.

15. Rope Safety Training teaches iron workers specialized techniques to access

structures – namely, offshore wind turbines – while using ropes as the primary means of support, positioning, and fall protection.

16. These trainings are certainly necessary to ensure that workers are equipped with the specialized skills and safety training that offshore wind work demands, but they are also very costly. The purchase of the Mobile Training Center cost tens of thousands of dollars, and our member organizations have spent hundreds of thousands of dollars on all of the training for workers seeking jobs on offshore wind projects.

17. Our members make these kinds of investments in training workers to qualify for this type of work because offshore wind is ready to deliver hundreds of thousands of hours of work with great wages and benefits.

18. For example, Iron Workers Local 7 paid for 20 Iron Workers to travel from Maine to Massachusetts for training at the Massachusetts Maritime Academy for roughly a week for GWO certification. Dozens more of our member organizations' workers were also trained at the Massachusetts Maritime Academy. They have invested almost a million dollars in training workers for offshore wind work.

19. Similarly, the North Atlantic States Regional Council of Carpenters have trained workers with GWO Basic Safety Training, GWO Advanced Rescue Training, GWO Basic Technical Training, GWO Slinger Signaler and HUET training as well – all of which are trainings specifically required by the offshore wind industry for work on offshore wind projects.

20. With the pause on the offshore wind industry we have seen workers who qualify for these types of jobs – because of the training that we and they have invested time, money and resources into – left out on the sidelines. Trained workers are not only now not working the good jobs that the offshore wind industry promised to bring, but flat out unable to work because the

offshore wind industry jobs were not replacing other jobs, they were additive. Without them, there is simply less work than there would otherwise be, and our trained workers are left to face the impact of the loss of these jobs.

21. The “pause” is really an unexpected layoff for affected members. Many uprooted their lives traveling to out-of-town facilities to secure the necessary training, The pause leaves them uncertain whether they will ever return to these jobs, and if so, when. Our organizations will lose the momentum we have created in developing the workforce to do this labor. We have a real concern that when the pause is ended, developers will again try to fill the offshore wind jobs with workers from other countries who already have GWO certification and the skills needed to perform the work. That is we have a real concern that the pause will jeopardize American worker participation in this new industry.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 6th day of August in 2025.

A handwritten signature in black ink, appearing to read "Francis Eanes", written over a horizontal line.

Francis Eanes

Executive Director, Maine Labor Climate Council